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9 KEITH LEERAY KINCADE

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

2 KEITH LEERAY KINCADE) Case No.: 2:24-cv-01508-SCR
3 Plaintiff,)
4 v.) STIPULATION TO EXTEND TIME
5 MARTIN O'MALLEY,) TO FILE BRIEF
6 Commissioner of Social Security,) (FIRST REQUEST)
7 Defendant.)

TO THE COURT:

9 Plaintiff Keith Leeray Kincade and Defendant Martin O'Malley,
10 Commissioner of Social Security, by and through their attorneys, stipulate, subject
11 to this court's approval, to extend the time from August 23, 2024 to September 20,
12 2024, for Plaintiff to file his Brief, with all other dates extended accordingly.
13 This is Plaintiff's first request for an extension. This request is made at the request
14 of Plaintiff's counsel to allow additional time to fully research the issues presented.
15 Counsel was on medical leave last month due to illness, working a modified

1 schedule. Upon her full return, she has faced a heavy briefing and hearing
2 schedule. As a result, Counsel requires additional time.

3 The parties request that the briefing schedule be modified as follows:
4 Plaintiff will file his Brief by September 20, 2024. Defendant will file his Brief by
5 October 21, 2024. Plaintiff may file any optional reply within 14 days of the
6 service of the Commissioner's Brief. The parties make this request in good faith
7 with no intention to unduly delay the proceedings.

8 | DATE: August 27, 2024 Respectfully submitted,

LAW OFFICES OF LAWRENCE D. ROHLFING, INC., CPC

/s/ *Monica Perales'*

BY:

Monica Perales
Attorney for plaintiff Mr. Keith Leeray Kincade

DATE: August 27, 2024

PHILLIP TALBERT
United States Attorney
MATHEW W. PILE
Associate General Counsel
Social Security Administration

/s/ *Liva Jamala Edwards*

BY:

Liva Jamala Edwards
Special Assistant United States Attorney
Attorneys for defendant Martin O'Malley,
Commissioner of Social Security
|*authorized by e-mail|

25 ¹ Counsel for the plaintiff attests that all other signatories listed, and on whose
26 behalf the filing is submitted, concur in the filing's content and have authorized the
 filing.

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2 ORDER
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4 Based upon the stipulation of the parties, and for cause shown,
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6 **IT IS HEREBY ORDERED** that the briefing schedule is amended:
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8 Plaintiff's Brief is due **September 20, 2024**; Defendant's Brief is due **October 21, 2024**; Plaintiff's optional reply is due **November 4, 2024**.
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10 **SO ORDERED**
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12 DATE: September 3, 2024
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16 SEAN C. RIORDAN
17 UNITED STATES MAGISTRATE JUDGE
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